

Inclusion of Deferred Foreign Income Upon Transition to Participation Exemption System

▶ **Attach to tax return.**

▶ **Go to www.irs.gov/Form965 for instructions and the latest information.**

For calendar year 20 _____, or other tax year beginning _____, 20 _____ and ending _____, 20 _____, of the filer.	
Name of person filing this return	Identifying number

Note: Throughout this form, the term "2019 tax year" refers to 2019 calendar tax years and fiscal tax years of the person filing this return that begin in 2019.

Part I	Section 965(a) Inclusion		
1	Reserved	1	
2	Reserved	2	
3	2019 tax year section 965(a) inclusions from pass-throughs. Enter the sum here and on your tax return as follows. Corporations: Enter the line 3 total on Form 1120, Schedule C, line 15, column (a), or the corresponding line of other corporate tax returns. All others: See instructions ▶	3	
4	Reserved	4	
5	Reserved	5	
6	Reserved ▶	6	

Part II	Section 965(c) Deduction		
7	Reserved	7	
8	Reserved	8	
9	Reserved	9	
10	Reserved	10	
11	Reserved	11	
12	Reserved	12	
13	Reserved	13	
14	Reserved	14	
15	Reserved	15	
16	Reserved	16	
17	2019 tax year section 965(c) deduction from pass-throughs. Enter the sum here and on your tax return as follows. Corporations: Enter the line 17 total on Form 1120, Schedule C, line 15, column (c), or the corresponding line of other corporate tax returns. All others: See instructions	17	

Part III	Elections	Yes	No
A	Was an election made to pay the net tax liability over 8 years as provided for in section 965(h)?		
B	Complete if a shareholder in an S corporation. Was an election made to defer payment of net tax liability as provided for in section 965(i)?		
C	Complete if a Real Estate Investment Trust. Was an election made to include income over 8 years as provided for in section 965(m)?		
D	Was an election made not to apply a net operating loss deduction as provided in section 965(n)?		
E	Was the election provided for in Regulations section 1.965-2(f)(2) made?		

For Privacy Act and Paperwork Reduction Act Notice, see the separate instructions.